

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO FITCHBURG GAS AND ELECTRIC LIGHT COMPANY
D.T.E. 01-103

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy (“Department”) submits to Fitchburg Gas and Electric Light Company (“Fitchburg” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

- 1 Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2 Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3 These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4 The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

- 5 The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve one copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (2) copies of the responses to John Geary, Hearing Officer; and three (3) copies of the responses to Jeff Hall, Senior Analyst, Rates and Revenues Division.

REQUESTS

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| DTE-1-1 | Refer to Exh. FGE-1 (MHC) at 22. Please explain why the Company used the 1992 FERC Form 1 to determine the allocation of the FAS 109 assets between the gas and electric division. |
| DTE-1-2 | Refer to Exh. FGE-1 (MHC) at 28. Did the Company include the standard offer service fuel adjustment (“SOSFA”) in its determination of the above market payments to power suppliers? If not, please explain why the SOSFA was not included. |
| DTE-1-3 | Refer to Exh. FGE-1 (MHC) at 34. Please provide a copy of the 1983 cost of service study referenced on this page. |
| DTE-1-4 | Refer to Schedule MHC-2, at 7 and 9. Please explain why the values for Millstone 3 are different on pages 7 and 9. |
| DTE-1-5 | Refer to Schedule MHC-3, at 1. Please explain why the allocation of lines 5 and 20 (“Depreciation”) is not based on the 40/60 generation/transmission and distribution split referenced in Mr. Collin’s testimony. |
| DTE-1-6 | Refer to Schedule MHC-5, at 4 (Note 3). Please explain the derivation of the generation net plant allocator and provide a copy of Schedule B referenced in this note. |
| DTE-1-7 | Refer to Exh. FGE-2 (KMA) at 7. Please explain why the Company determined it was inappropriate to include overdesignations purchases in the external transmission charge account. |

May 7, 2002

Patricia French, Esq.
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
260 Franklin Street
Boston, Massachusetts 02110-3173

Re: Fitchburg Gas and Electric Light Company, D.T.E. 01-103

Dear Ms. French,

Please find the Department's First Set of Information Requests. The responses are due by 5:00 p.m. May 21, 2002.

Sincerely,

John J. Geary
Hearing Officer

cc: Mary L. Cottrell, Secretary
Wilner Borgella, Esq.
Carol Wasserman, Esq.,